

United States Senate

WASHINGTON, DC 20510

June 18, 2020

Joseph Brazauskas
Associate Administrator for Congressional Affairs
Environmental Protection Agency
1200 Pennsylvania Ave NW, Room 3426
Washington DC 20460

RE: (b)(6)

Dear Mr. Brazauskas:

This letter is in reference to my constituent, (b)(6)
(b)(6) an 8(a) EDWOSB providing environmental consulting
services to government and private entities.

(b)(6) reached out to our office regarding his concerns with the handling of a recent
solicitation for procurement of continuation of services previously provided by (b)(6)
(b)(6) believes there were significant irregularities in this process,
which culminated in a cancellation of the solicitation in its entirety. It is his position that these
irregularities may be the result of corruption in the procurement process.

He has previously contacted the EPA Inspector General's office about his concerns and has had
no response. (b)(6) privacy release and a more thorough explanation of the issue, as well as
a copy of his IG letter, are attached for your review.

I respectfully ask that you review the enclosed documents and provide a response to (b)(6)
appeal to the Inspector General's office. You may direct your response to my Deputy State
Director, Sue Zimskind, by email to sue_zimskind@toomey.senate.gov or by fax to 202-228-
2727.

Thank you for your attention to this request.

Sincerely,



Pat Toomey
U.S. Senator

Privacy Act Release Form

TO WHOM IT MAY CONCERN,

I am aware that the Privacy Act of 1974 prohibits the release of personal information without my express written consent. I, (b)(6)

(b)(6) do hereby give consent for information concerning (b)(6) to be provided to Senator Pat Toomey and/or his staff. Please provide all relevant information he may require in order to assist me with my inquiry. **Your signature is required.**

Signature: (b)(6)

Date: 6-18-2020

Address: (b)(6)

City, State, Zip: (b)(6)

Email: (b)(6)

Phone: (b)(6)

Fax: (b)(6)

Please specify the federal agency involved in this inquiry: Environmental Protection Agency

Please provide your social security number: N/A

Please provide any other identifying numbers that will help us with our inquiry:

(b)(6)

Please explain the problem you are having and the outcome you seek in this box below:

Please see attached correspondence

Is another Congressional office assisting you?

We contacted the offices of Senator Robert Casey and Representative Chrissy Houlahan but have not received a response to date.

Are you making this request on behalf of someone else? No.

Please return this completed form and all relevant documents to my Allentown office located at:

1150 S. Cedar Crest Blvd, Suite 101, Allentown PA 18103
Phone 610 434 1444 Fax 202 228 2727, by email to:
casework@toomey.senate.gov

(b)(6)

June 11, 2020

Honorable Patrick Toomey
U.S. Senator
US Custom House
200 Chestnut Street
Suite 600
Philadelphia, PA 19106

Re:

(b)(6)

Dear Senator Casey:

(b)(6) corporation providing environmental consulting services to government and private entities including the Department of Defense, Army Corps of Engineers, New England District ("CENAE").

(b)(6)
(b)(6) At that time, (b)(6) held a contract to perform technical services on the (b)(6) under contract (b)(6) performance was rated with Very Good and Exceptional CPARs for the duration of the contract. Prior to Fiscal Year 2014 contract, (b)(6) had performed as a subcontractor on the same (b)(6) with Weston Solutions as the prime contractor from 1998.

On October 23, 2019, Solicitation No. (b)(6) was issued for the procurement of the continuation of the services previously provided by (b)(6) at the site. The Solicitation was designated as a "Small Business" set-aside procurement. (b)(6) teamed with its current subcontractors to seek the Award.

Based upon the long duration of service on the Project and the institutional knowledge of the (b)(6) was in an enviable position to be awarded the contract that was for five years and a maximum of \$15,000,000. (b)(6) submitted its Proposal on November 22, 2019.

On February 19, 2020, (b)(6) received a pre-award Questionnaire and a Request to extend the Solicitation Acceptance Period through March 22, 2020 from CENAE. On February 24, 2020, (b)(6) received a Certificate of Current Cost Request from CENAE. It would be unprecedented that such pre-award documents would be issued to an entity that was not the selected award recipient.

Shockingly, on April 15, 2020 (b)(6) received notification that the Solicitation had been cancelled in its entirety. The contracting officer at CENAE informed (b)(6)

(b)(6)

Honorable Patrick Toomey
June 11, 2020
Page 2 of 3

verbally that CENAE was no longer going to receive this work from EPA.

The cancellation resulted in (b)(6) and its Team members suffering a loss of significant sums expended to complete the proposal. In addition, the cancellation causes the government, which must have expended substantial time and funds to plan, initiate and manage the Procurement, to start over again expending substantial time and effort. Further, the cancellation will result in the loss of millions of dollars in revenue to (b)(6)

Finally, (b)(6) has suffered a significant injury to its reputation evidenced by the fact that other contractors have rejected (b)(6) as a potential team member for the current EPA procurement on the assumption that (b)(6) must have acted improperly to have lost the Contract at such a late stage. The conduct of the EPA will have long standing impact on the prospects for (b)(6) in the marketplace.

There is no plausible explanation or reasonable basis for the EPA to have caused the CENAE Solicitation to be cancelled at the stage where (b)(6) had been determined to be the Awardee.

Based upon facts learned to date, it is our opinion that the procurement process may have been corrupted. As such, we felt it was a matter ripe for investigation by the EPA. I sent a letter to the Inspector General of the EPA, a copy of which is attached, to which we have not had any response. I have made repeated attempts to the main and regional offices to inquire as to the status of the matter. I have not been able to speak to anyone. The problem may be related to the current Covid-19 virus situation. However, the delay may materially impact the investigation.

We recently learned that the EPA issued notice via email on June 4, 2020 that the EPA was soliciting information to issue a Task Order under the above noted contract for the (b)(6) to DES contract holders.

(b)(6) has filed a Protest with the EPA to the solicitation and prospective award and requested the contract be awarded to (b)(6) who had essentially won the contract and would have been formally awarded the contract absent to cancellation. A copy of the Protest is attached.

(b)(6) asks that you take whatever immediate steps needed to determine what the EPA Inspector general is doing with regard to the apparent procurement irregularities and provide whatever assistance you can to correct this terrible injustice.

(b)(6)

Honorable Patrick Toomey
June 11, 2020
Page 3 of 3

Please contact me with any questions

Thank you for your consideration.

Very truly yours,

(b)(6)

(b)(6)

From: Bagocius, Maureen <Bagocius.Maureen@epa.gov>
Sent: Wednesday, June 17, 2020 10:20 AM
To: (b)(6)
Subject: (b)(6)

[EXTERNAL]

Received.

Thank you.

Maureen Bagocius
Contracting Officer
EPA New England
5 Post Office Square Suite 100
Boston, MA 02109-3912
Office: 617-918-1968
Cell: 857-829-8260
bagocius.maureen@epa.gov

From: (b)(6)
Sent: Wednesday, June 10, 2020 2:12 PM
To: Bagocius, Maureen <Bagocius.Maureen@epa.gov>
Subject: (b)(6)

Ms. Bagocius:

Please see the attached correspondence regarding the above noted.

Please confirm receipt.

Please contact me with any questions.

(b)(6)

CONFIDENTIALITY: This email and attachments may contain information which is confidential and proprietary. The information contained in this transmission is intended for the personal and confidential use of the recipient(s) named above. Disclosure or use of any such confidential or proprietary information without the written permission of (b)(6) is strictly prohibited. If you received this email in error, please notify the sender by return e-mail and delete this email from your system.
Thank you

(b)(6)

June 10, 2020

Ms. Maureen Bagocius
Contracting Officer
EPA New England
5 Post Office Square, Suite 100
Boston, MA 02109-3912

Re:

(b)(6)

Dear Ms. Bagocius:

Please accept this letter as notice of the formal protest by (b)(6) of the solicitation and award of the anticipated Task Order under the above noted contract for the (b)(6) ("Project") indicated by your email dated June 4, 2020 to DES contract holders. (b)(6) has standing to file this protest based upon being an "interested party" as the holder of the prior contract for the Project, all known facts indicating having been selected as the awardee of (b)(6) ("Solicitation") and having a direct and significant economic interest in the matter.

By way of background, (b)(6) is a Pennsylvania corporation providing environmental consulting services to government and private entities including the Department of Defense, Army Corps of Engineers, New England District ("CENAE"). (b)(6) a Pennsylvania entity was acquired by (b)(6). At that time, (b)(6) held a contract to perform technical services on the (b)(6) under contract (b)(6) performance was rated with Very Good and Exceptional CPARs for the duration of the contract. Prior to Fiscal Year 2014 contract, (b)(6) had performed as a subcontractor on the same (b)(6) Project with Weston Solutions as the prime contractor from 1998.

On October 23, 2019, the Solicitation was issued for the procurement of the continuation of the services previously provided by (b)(6) at the site. The Solicitation was designated as a "Small Business" set-aside procurement. (b)(6) teamed with its current subcontractors to seek the Award. The Team was:

(b)(6) (Prime Contractor). Successfully completed the current 5 year, \$25M prime contract awarded in 2014 by CENAE. (b)(6) work history at (b)(6) spanned 13 years on multiple contracts.

Weston (Primary Subcontractor). 23-year history supporting CENAE and EPA RI at the (b)(6) site. Awarded the 2007 AGC Build America Award-Environmental for removal actions at the 1.5 Mile Reach. Experience in

(b)(6)

Ms. Maureen Bagocius
June 10, 2020
Page 2 of 3

performing 100% of the PSC SOW. Supported development of (b)(6) data/determination mgmt. systems.

HDR / Hydroqual (Primary Subcontractor). Performed extensive modeling at (b)(6) since 2002. Experience in multi-media sampling for PCBs. Supporting the HSPF and EFDC models at the (b)(6) site. Developed linkages between HSPF and EFDC models and between EFDC and FCM models.

Stantec (Primary Subcontractor). 21-year history at the (b)(6) site participating on 22 projects via Woodlot ecological/hydrological characterization, F&T modeling of PCBs; and habit / revegetation restoration.

Biohabitats (Specialty Subcontractor). Ten-year history at the (b)(6) site providing technical expertise on ecological restoration alternatives for "Rest of River" area. Participated in EPA's 2011 (b)(6) Charette/Workshop.

Kern (Specialty Subcontractor). Provided state of the science decision making through innovative statistical practices in design and implementation of environmental, ecological and wildlife management studies.

Geodesy (Specialty Subcontractor). Provided GIS, Data Mgmt. and mapping services to the (b)(6) project since 1998. Developed the original stack bar maps of the ROR.

Mike Palermo Consulting (Specialty Subcontractor) Dr. Palermo has acted as a technical consultant to EPA Region 1 for the (b)(6) site since the late 1990s, providing technical input and oversight for the 1% Mile OU.

Based upon the long duration of service on the Project and the institutional knowledge of the (b)(6) was in an enviable position to be awarded the contract that was for five years and a maximum of \$15,000,000. (b)(6) submitted its Proposal on November 22, 2019.

On February 19, 2020, (b)(6) received a pre-award Questionnaire and a Request to extend the Solicitation Acceptance Period through March 22, 2020 from CENAE. On February 24, 2020, (b)(6) received a Certificate of Current Cost Request from CENAE. It would be unprecedented that such pre-award documents would be issued to an entity that was not the selected award recipient.

Shockingly, on April 15, 2020 (b)(6) received notification that the Solicitation had been cancelled in its entirety. The contracting officer at CENAE informed (b)(6)

(b)(6)

Ms. Maureen Bagocius
June 10, 2020
Page 3 of 3

verbally that CENAE was no longer going to receive this work from EPA.

There is no plausible explanation or reasonable basis for the EPA to have caused the CENAE Solicitation to be cancelled at the stage where (b)(6) had been determined to be the Awardee. This is a matter ripe for investigation by the EPA.

Absent the cancellation, (b)(6) would have been awarded the contract. As such, the action by EPA was arbitrary, capricious and constitutes a significant prejudicial error in the procurement process.

The cancellation resulted in (b)(6) and its Team members suffering a loss of significant sums expended to complete the proposal. In addition, the cancellation causes the government, which must have expended substantial time and funds to plan, initiate and manage the Procurement, to start over again expending substantial time and effort. Further, the cancellation will result in the loss of millions of dollars in revenue to (b)(6)

Finally, (b)(6) has suffered a significant injury to its reputation evidenced by the fact that other contractors have rejected (b)(6) as a potential team member for the current EPA procurement on the assumption that (b)(6) must have acted improperly to have lost the Contract at such a late stage. The conduct of the EPA will have long standing impact on the prospects for (b)(6) in the marketplace.

It is also important to note that the procurement was issued as a "Small Business" set aside. Proceeding as indicated in your email will deny the intention that a small business be awarded the contract.

(b)(6) having "won" the contract, and based upon any sense of fairness and equity, demands that (b)(6) be awarded the work via a sole source direct award. Anything less would constitute a grievous breach of the government procurement process.

Thank you for your consideration.

Very truly yours,

(b)(6)

(b)(6)

April 22, 2020

Sean O'Donnell, Inspector General
Office of the Inspector General
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W (2410T)
Washington, DC 20460

Re: (b)(6)

Dear Mr. O'Donnell:

The purpose of this correspondence is to bring to your attention a situation that may involve a violation of applicable standards governing contract procurements. In addition, the circumstances described herein are highly likely to effect the economy and efficiency of performance of the work described below and result in leading to the possible fraud, waste or abuse of government funds, personnel or equipment including, but not limited to, a significant financial loss to the government by having to repeat an essentially completed procurement. Finally, there may have been errors and/or misconduct in the cancellation of the solicitation and/or future award of the subject procurement.

(b)(6) is a Pennsylvania corporation providing environmental consulting services to government and private entities including the Department of Defense, Army Corps of Engineers, New England District ("CENAE"). (b)(6) a Pennsylvania entity was acquired by (b)(6). At that time, (b)(6) held a contract to perform technical services on the (b)(6). (b)(6) performance was rated with Very Good and Exceptional CPARs for the duration of the contract. Prior to Fiscal Year 2014 contract, (b)(6) had performed as a subcontractor on the same (b)(6) Project with Weston Solutions as the prime contractor from 1998.

On October 23, 2019, Solicitation (b)(6) ("Solicitation") was issued for the procurement of the continuation of the services previously provided by (b)(6) at the site. The Solicitation was designated as a "Small Business" set-aside procurement.

(b)(6) teamed with its current subcontractors to seek the Award. The Team is:

- (b)(6) (Prime Contractor). Successfully completed the current 5-year, \$25M prime contract awarded in 2014 by CENAE. (b)(6) work history at (b)(6) spans 13 years on multiple contracts.
- **Weston** (Primary Subcontractor). 23-year history supporting CENAE and EPA R1 at the (b)(6) site. Awarded 2007 AGC Build America Award-Environmental for removal actions at the 1.5 Mile Reach. Experience in

(b)(6)

Sean O'Donnell, Inspector General

April 22, 2020

Page 2 of 7

- performing 100% of the PSC SOW. Supported development of (b)(6) data/information mgmt. systems.
- **HDR/ Hydroqual** (Primary Subcontractor). Performed extensive modeling at (b)(6) since 2002. Experience in multi-media sampling for PCBs. Supporting the HSPF and EFDC models at the (b)(6) site. Developed linkages between HSPF and EFDC models and between EFDC and FCM models.
- **Stantec** (Primary Subcontractor). 21-year history at the (b)(6) site participating on 22 projects via Woodlot ecological/hydrological characterization, F&T modeling of PCBs; and habitat/revegetation restoration.
- **Biohabitats** (Specialty Subcontractor). Ten-year history at the (b)(6) site providing technical expertise on ecological restoration alternatives for "Rest of River" area. Participated in EPA's 2011 (b)(6) Charette/Workshop.
- **Kern** (Specialty Subcontractor). Provided state of the science decision making through innovative statistical practices in design and implementation of environmental, ecological and wildlife management studies.
- **Geodesy** (Specialty Subcontractor). Provided GIS, data mgmt., and mapping services to the (b)(6) project since 1998. Developed the original stack bar maps of the RoR.
- **Mike Palermo Consulting** (Specialty Subcontractor) Dr. Palermo has acted as a technical consultant to EPA Region 1 for the (b)(6) site since the late 1990s, providing technical input and oversight for the 1 ½ Mile OU

Based upon the long duration of service on the Project and the institutional knowledge of the (b)(6) was in an enviable position to be awarded the contract which was for five years and a maximum of \$15,000,000.

(b)(6) submitted its Proposal on November 22, 2019. On February 19, 2020, (b)(6) received a pre-award Questionnaire and a Request to extend the Solicitation Acceptance Period through March 22, 2020 from CENAE. On February 24, 2020, (b)(6) received a Certificate of Current Cost Request from CENAE. It would be unprecedented that such pre-award documents would be issued to an entity that was not the selected award recipient.

The concern of (b)(6) is the possible involvement of two former employees of (b)(6) in a scheme to sabotage (b)(6) being awarded the subject contract. The two employees are (b)(6) (b)(6) were (b)(6) and, after (b)(6) acquisition of (b)(6) ;

(b)(6)

Sean O'Donnell, Inspector General

April 22, 2020

Page 3 of 7

(b)(6)

(b)(6)

Over the course of 2019 and into 2020, (b)(6) repeatedly expressed their discontent with (b)(6) operating procedures. (b)(6) believes, based upon its preliminary investigation, that (b)(6) in particular, engaged in a campaign to disparage (b)(6) and its management to other employees, clients and the EPA Project Coordinator on site.

(b)(6) have a long-standing relationship with (b)(6) at the site. In fact, (b)(6) has repeatedly claimed that she was instrumental in influencing the procurement strategy and selection in 2014. In 2019 and 2020, (b)(6) made repeated statements to (b)(6) management, including during the pendency of the Proposal, that he did not want any changes of (b)(6) personnel at the site, i.e. (b)(6).

While (b)(6) were notable personnel that performed very well on this Project, they were far from the only competent and project-specific experienced (b)(6) employees to conduct the work along with the balance of the Team. (b)(6) and (b)(6) roles were principally that of coordination and oversight on the Project. As such, their individual technical contributions were relatively minor with much of their time being spent overseeing technical experts supplied by Team members. It is important to note that the specified technical experts are still under contract to (b)(6) and are included in the Solicitation response. In other words, aside from the two project coordinators, the performance of the technical work is unchanged with their absence.

Despite having negotiated a new financial package with (b)(6) that would be effective if (b)(6) were awarded the contract, on March 19, 2020, (b)(6) and (b)(6) unexpectedly resigned simultaneously via e-mail to a VP of (b)(6). (b)(6) gave only two weeks' notice and subsequently stated they were unwilling to assist in any transition to new staff or a new contractor.

It was later learned that on February 14, 2020, while still employed by (b)(6), (b)(6) started a new corporation, (b)(6) in Massachusetts with the registered office at the personal address of (b)(6) and (b)(6) are the sole shareholders, board members and officers of the entity.

(b)(6)

Sean O'Donnell, Inspector General
April 22, 2020
Page 4 of 7

After receiving the resignations of (b)(6) (b)(6), pursuant to terms of the procurement and good business practices, contacted CENAE to advise them of the resignations and to determine what, if any, changes might be needed to proceed with the Solicitation process. It was then (b)(6) learned that before (b)(6) was notified of their resignation and before (b)(6) had an opportunity to notify any team members or clients, (b)(6) had already notified all stakeholders (including clients and subcontractors) of their resignations. It is believed (b)(6) may have discussed their resignations with (b)(6) of the EPA even earlier.

Based on (b)(6) policy regarding control of contract information prior to award, (b)(6) did not inform (b)(6) of the receipt of the Pre-Award documents. If (b)(6) had knowledge of the status of the Award the information came from a third party.

At the request of US Army Corps of Engineers, New England District, (b)(6) submitted alternative key personnel for completion of the current contract (b)(6). Proposed personnel from the (b)(6) were deemed to have equivalent qualifications of (b)(6) and were acceptable to both CENAE and US EPA. (b)(6) was thereafter authorized to complete the Contract. (b)(6) has initiated its efforts with its Team to complete the contract and has received positive feedback on performance in the interim.

The acceptance of the substituted personnel by CENAE on the current contract deemed these personnel qualified and acceptable to replace (b)(6) in the Proposal for the new contract. (b)(6) then contacted CENAE to determine how CENAE wanted to proceed in (b)(6) amending its Proposal to complete the procurement process.

Shockingly, on April 15, 2020 (b)(6) received notification that solicitation (b)(6) had been cancelled in its entirety. The contracting officer at CENAE informed Bluestone verbally that CENAE is no longer going to receive this work from EPA. This cancellation results in (b)(6) and its Team members suffering a loss of significant sums expended to complete the proposal. In addition, the cancellation causes the government, which must have expended substantial time and funds to plan, initiate and management the Procurement, to start over again expending substantial time and effort.

Based upon the above, and the reasonable inferences drawn therefrom, there are several issues that merit investigation as the disruption caused by the cancellation of the Solicitation, through no fault of the CENAE, will, more likely than not, cause

(b)(6)

Sean O'Donnell, Inspector General
April 22, 2020
Page 5 of 7

additional costs and burden on the government and may involve duplicitous and improper activity. The issues include, but are not limited to:

- Was it the intent of (b)(6) to disrupt the normal process for the award of the new contract by resigning at a time when they had to know the resignations might hold up any Award being issued;
- Was it the intent of (b)(6) to seek the issuance of a subsequent Award to themselves or their new corporation;
- What would cause (b)(6) to resign just prior to the expiration date of the Proposal extension (and, therefore, likely within days of the award to (b)(6)). They did not have the date of the proposal extension or the pre-award documents from (b)(6), and, therefore, it seems very likely that they received it from another source;
- As stated above, (b)(6) has worked with (b)(6) for many years and stated multiple times his deep concern that they keep working for him;
- (b)(6) indicated verbally to (b)(6) in December 2019 that, while he was not a voting member, he would be participating with the CENAE selection board for the procurement. As such, he (along with CENAE personnel) would have had intimate knowledge of the outcome and timing of the award;
- CENAE has administered the series of (b)(6) contracts for more than 20 years. The sudden removal of this specific work from their control right after the (b)(6) resignation gives the appearance that the two events are connected. In other words, it is possible that (b)(6) removed the requirement from CENAE so that he could contract it in a way to benefit (b)(6) and their company, (b)(6) and
- That on the day following the resignations by (b)(6) the contracting officer for CENAE informed (b)(6) that CENAE would be requesting a personnel modification to the Proposal for the Solicitation response once the personnel issues concerning the completion of the existing contract were resolved. Therefore, at that time CENAE still held the procurement. What happened to cause the EPA to withdraw the procurement from CENAE that had held the Project for over 20 years?

The legal standard of review by your office is well established.

It is understood that the mission of the OIG is to promote economy, efficiency and effectiveness, and to prevent and detect fraud, waste, and abuse through independent oversight of the programs and operations of the EPA as well as promoting the effectiveness and efficiency of government operations. To achieve this end, the OIG's Office of Investigations manages and has overall responsibility for investigations

(b)(6)

Sean O'Donnell, Inspector General

April 22, 2020

Page 6 of 7

involving serious administrative misconduct by EPA employees such as abuse of authority or violations of the Procurement Integrity Act. 41 U.S.C. § 2102. See also FAR 3.104-3(a)

The legal standards are also clearly established.

Except as provided by law, a person shall not knowingly disclose contractor bid or proposal information or source selection information before the award of a Federal agency procurement contract to which the information relates." 41 U.S.C. § 2102(a)(1). This prohibition applies to a person that is "is a present or former official of the Federal Government; or (ii) is acting or has acted for or on behalf of, or who is advising or has advised the Federal Government with respect to, a Federal agency procurement; and (B) by virtue of that office, employment, or relationship has or had access to contractor bid or proposal information or source selection information."

In addition, "Except as provided by law, a person shall not knowingly obtain contractor bid or proposal information or source selection information before the award of a Federal agency procurement contract to which the information relates." 41 U.S.C. § 2102(b). See also FAR 3.104-3(b).

"Source selection information" is any information prepared for use by a Federal agency to evaluate a bid or proposal to enter into a Federal agency procurement contract, if that information previously has not been made available to the public or disclosed publicly and its disclosure would jeopardize the integrity or successful completion of the Federal agency procurement to which the information relates." 41 U.S.C. § 2101(7).

Remedies for a violation of the applicable law include Administrative Actions canceling the Federal agency procurement, initiating a suspension or debarment proceeding and/or initiating an adverse personnel action 41 U.S.C. § 2105(c).

(b)(6) is requesting that the Office of the Inspector General investigate this situation. If, in fact, an award is being contemplated that includes, directly or indirectly, (b)(6) individually or (b)(6) as either prime or subcontractors, (b)(6) requests that any such Award be stopped.

It would be an absolute travesty for the federal contracting system to be manipulated to allow these individuals, or others unknown, who may have, or attempted, to misuse the procurement system for their personal gain while causing such financial harm to the government and (b)(6). Such a result would establish a precedent that will affect the system for years.

(b)(6)

Sean O'Donnell, Inspector General

April 22, 2020

Page 7 of 7

Please contact me if you require any additional information.

Thank you for your consideration of this matter.

If you have any questions, please contact me.

I was unable to determine if this correspondence should have been sent to another office in your organization. If so, please forward this correspondence to the appropriate office.

I believe that "time is of the essence" to investigate this matter as there is only three months left on the current contract.

Very truly yours,

(b)(6)

VIA FEDEX & EMAIL